

Lawrence Schwab, Esq. [Cal. Bar # 85600]
Thomas M. Gaa, Esq. [Cal. Bar # 130720]
BIALSON, BERGEN & SCHWAB,
A Professional Corporation
2600 El Camino Real, Suite 300
Palo Alto, CA 94306
Telephone: (650) 857-9500
Fax: (650) 494-2738

Counsel for Fastly, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
In re:	:
Gawker Media LLC, <u>et al.</u> ¹	:
Debtors.	:
	:
	X

**NOTICE OF APPEARANCE AND REQUEST FOR
SPECIAL NOTICE AND DOCUMENTS OF FASTLY, INC.**

PLEASE TAKE NOTICE that Fastly, Inc. a creditor and party in interest in the above-entitled bankruptcy cases, hereby enters its appearance by and through its counsel, Bialson, Bergen & Schwab, a Professional Corporation, pursuant to 11 U.S.C. 1109(b) and Rule 9010 of the Federal Rules of Bankruptcy Procedure (“Rule 9010”).

PLEASE TAKE FURTHER NOTICE that Fastly, Inc. hereby requests that all notices, pleadings, documents, and correspondence required to be served on creditors, all duly appointed committees, and any other party-in-interest pursuant to 11 U.S.C. §§ 102(1) and 342, Rule 2002 and Rule 9007 of the Federal Rules of Bankruptcy Procedure, order of the Court and otherwise, whether sent by the Court, the debtor, or any other party-in-interest in these cases, be served on the following counsel for Fastly, Inc. and that the following counsel be added to the Court’s master mailing list:

**BIALSON, BERGEN & SCHWAB,
a Professional Corporation**

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.’s offices are located at Andrassy ut 66. 1062 Budapest, Hungary.

Lawrence M. Schwab, Esq.
Thomas M. Gaa, Esq.
2600 El Camino Real, Suite 300
Palo Alto, CA 94306
Tel: (650) 857-9500
Fax: (650) 494-2738
Email: Tgaa@bbslaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telecopy, email or otherwise filed or made with regard to the above-referenced cases and any proceedings therein.

PLEASE TAKE FURTHER NOTICE that filing this Appearance and Request for Notice and Documents (A) is not, and may not be deemed or construed to be, (1) a waiver of Fastly, Inc.'s substantive or procedural rights (collectively, "Fastly, Inc.'s Rights"), including without limitation: (i) the right entry of a final order in noncore matters only after *de novo* review by a Federal District Court, (ii) the right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the reference withdrawn by a Federal District Court in any matter subject to mandatory or discretionary withdrawal, and (iv) any other rights, interests, claims, actions, setoffs, or recoupments, or (2) consent to the jurisdiction of the Court, and (C) hereby reserves all Fastly, Inc.'s Rights.

Dated: June 17, 2016

Respectfully submitted,

BIALSON, BERGEN & SCHWAB,
A Professional Corporation

/s/ Thomas M. Gaa

Thomas M. Gaa, Esq. [Cal. Bar # 130720]
2600 El Camino Real, Suite 300
Palo Alto, CA 94306
Telephone: (650) 857-9500
Fax: (650) 494-2738
E-mail: Tgaa@bbslaw.com

Attorneys for Creditor Fastly, Inc.